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REYES QUINONEZ
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 REYES QUINONEZ,

15 Defendant.
16

Case No. 1:23-cr-00054-JLT-SKO

UNOPPOSED ORDER TO AMEND
PRESENTENCE INVESTIGATION REPORT
(FINAL)

17 The draft Presentence Investigation Report (PSR) was filed in this matter on September
18 30, 2024. *See* Dkt. #46. Mr. Quinonez submitted his informal objections to the draft PSR on
19 February 3, 2025. *See* Dkt. #51-2. In his informal objections, Mr. Quinonez objected to counting
20 for criminal history score purposes, the prior conviction listed in paragraph 34 of the draft PSR.
21 *See* Dkt. #51-2 at 4.

22 The final PSR was filed in this matter on February 11, 2025. *See* Dkt. #51. On February
23 18, 2025, Mr. Quinonez filed his formal objections to the PSR and continued his objection to
24 counting for criminal history purposes, the prior conviction now listed in paragraph 36 of the
25 final PSR, which the government joined. *See* Dkt. #52 at 4-5; Dkt. #53.

26 At sentencing on March 10, 2025, the Court sustained the objection to counting
27 paragraph 36 for criminal history score purposes.

28 As a result, it is necessary to amend the final PSR to reflect the sustained objection to

several paragraphs contained within the final PSR. Specifically, that paragraph 36 be amended to remove the 3 points attributed to it in the final PSR, and to accordingly amend paragraph 40 to change the subtotal criminal history score to 8, to amend paragraph 42 to change the total criminal history score to 9, and to amend paragraph 43 to change the criminal history category to category IV. Additionally, it is necessary to amend paragraph 77 to change the criminal history category to IV and to adjust the applicable guideline range accordingly. Lastly, it is necessary to amend the sentencing recommendation at Dkt. #51-1 at 1 to change the criminal history category to IV, to adjust the applicable guideline range accordingly, and to adjust the recommended sentence to the sentence orally recommended by probation at the time of sentencing.

This proposed order has been provided to, and approved by, both government counsel and the assigned probation officer who prepared the final PSR and both are in agreement with the amendments above.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: March 13, 2025

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
REYES QUINONEZ

ORDER

IT IS HEREBY ORDERED that the final Presentence Investigation Report filed on February 11, 2025, be modified in accordance with the above.

IT IS SO ORDERED.

Dated: **March 13, 2025**


UNITED STATES DISTRICT JUDGE